

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
)	
Plaintiff,)	C.A. No. 16-122-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.)	
)	
)	
Defendant.)	

**DECLARATION OF MICHAEL MATULEWICZ-CROWLEY
IN SUPPORT OF IBM'S OPENING CLAIM CONSTRUCTION BRIEF**

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Dated: April 17, 2017
5089759 / 43155

I, Michael Matulewicz-Crowley, declare that:

1. I am an attorney with the law firm of Desmarais LLP, counsel of record for Plaintiff International Business Machines Corporation (“IBM”) in the above-captioned matter, and I am admitted *pro hac vice* to this Court. I submit this declaration based on personal knowledge, and if called upon as a witness, I could competently testify to the truth of each statement herein.

2. I make this Declaration in support of IBM’s Opening Claim Construction Brief.

3. Attached hereto as Exhibit 1 is a true and correct copy of the “The X Window System” by Robert W. Scheifler and Jim Gettys.

4. Attached hereto as Exhibit B is a true and correct copy of U.S. Patent No. 4,688,167.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 17, 2017, in New York, NY.

/s/ Michael Matulewicz-Crowley
Michael Matulewicz-Crowley